

EXHIBIT A

Declaration of Susmita A. Gadre in Support of Geotab USA, Inc.'s Rule 11 Motion for Sanctions

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

17 WirelessWerx IP, LLC,
18 Plaintiff,
19 v.
20 Geotab USA, Inc.,
21 Defendant.

Case No. 2:23-cv-01769-CDS-DJA

**DECLARATION OF SUSMITA A.
GADRE IN SUPPORT OF GEOTAB USA,
INC.'S RULE 11 MOTION FOR
SANCTIONS**

1 I, Susmita A. Gadre, declare as follows:

2 1. I am an associate at the law firm of Wolf, Greenfield & Sacks, P.C. and counsel
3 of record for Defendant Geotab USA, Inc. I have personal knowledge of the facts stated in this
4 declaration and, if called as a witness, could and would testify competently to those facts.

5 2. Attached as Exhibit B is a true and accurate copy of the “Geotab GO vehicle
6 tracking device” page on Geotab USA’s website, available at <https://www.geotab.com/vehicle->
7 [tracking-device/](#). This screenshot was captured on November 6, 2023.

8 3. Attached as Exhibit C is a true and accurate copy of the “A look at the Geotab
9 GO Device: Past, present, and future” page of Geotab USA’s website, available at
10 <https://www.geotab.com/blog/geotab-go-device-past-present-future/>. This screenshot was
11 captured on November 6, 2023.

12 4. Attached as Exhibit D is a true and accurate copy of the “Geotab Partner
13 Downloads” Geotab USA’s website in 2004, as displayed in an archived copy from the Internet
14 Archive (also known as the Wayback Machine), available at
15 <https://web.archive.org/web/20041208221215/http://www.geotab.com/Downloads/index.htm>.
16 This screenshot was captured on November 6, 2023.

17 5. Attached as Exhibit E is a true and accurate copy of a User Guide for
18 CHECKMATE by Geotab, which was the software used by Geotab USA at the time. This user
19 manual was available for download on Geotab USA’s website, as seen on page 1 of Exhibit C
20 (the “GEOTAB Checkmate User Manual”). This manual was available at least as early as 2004,
21 as evidenced by Exhibit C, and the metadata of the version downloadable from the Internet
22 Archive says that the document was last modified on August 31, 2004. The particular copy that
23 is present in Exhibit E was downloaded on November 6, 2023.
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1 6. Attached as Exhibit F is a true and accurate copy of a document filed by the
2 defendants in *WirelessWerx IP LLC v. Raytheon Techs. Corp.*, No. 22-01059 (W.D. Texas).
3 This document is ECF No. 13, Defendant Raytheon Techs. Corp.'s Rule 12(b)(6) Motion to
4 Dismiss Plaintiff's Complaint, filed March 2, 2023.
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6 7. Attached as Exhibit G is a true and accurate copy of a document filed by the
7 defendants in *WirelessWerx IP LLC v. Raytheon Techs. Corp.*, No. 22-01059 (W.D. Texas).
8 This document is ECF No. 19, Defendant Raytheon Techs. Corp.'s Reply in Support of Its Rule
9 12(b)(6) Motion to Dismiss Plaintiff's Complaint, filed March 23, 2023.
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11 8. Attached as Exhibit H is a true and accurate copy of a document filed by the
12 plaintiffs in *WirelessWerx IP LLC v. Raytheon Techs. Corp.*, No. 22-01059 (W.D. Texas). This
13 document is ECF No. 25, Notice of Voluntary Dismissal, filed June 5, 2023.
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15 9. Attached as Exhibit I is a true and accurate copy of a document filed by the Court
16 in *WirelessWerx IP LLC v. Raytheon Techs. Corp.*, No. 22-01059 (W.D. Texas). This document
17 is ECF No. 26, Order, filed June 6, 2023.
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19 I declare under penalty of perjury that the foregoing is true and correct to the best of my
knowledge and belief.
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21 Date: December 4, 2023

/s/ Susmita A. Gadre

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26 Attorney for Defendant Geotab USA, Inc.
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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on the below date. Any other counsel of record will be served via email and first-class mail.

Date: December 4, 2023

/s/ Susmita A. Gadre

Susmita A. Gadre